

# **EXHIBIT C**

P.R. 4-3 Joint Statement, Exhibit C

**WITNESS DISCLOSURE**

In accordance with ContentGuard's P.R. 4-3 disclosures, ContentGuard may rely upon testimony (by declaration) from Dr. Michael Goodrich and/or Dr. Mark Stefik and/or Marc Kaufman.

In accordance with P.R. 4-3(d), Dr. Michael Goodrich and/or Dr. Mark Stefik and/or Marc Kaufman may testify about their backgrounds, the background of the subject matter discussed in the patents-in-suit, and the skill level of one of ordinary skill in the art. Dr. Michael Goodrich and/or Dr. Mark Stefik and/or Marc Kaufman may also testify in support of ContentGuard's proposed claim constructions. *See also* Exhibit A.

In addition to the above, Dr. Michael Goodrich and/or Dr. Mark Stefik and/or Marc Kaufman may offer testimony in response or in rebuttal to any arguments or expert testimony offered by Defendants.